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December 16, 2024

**Via ECF**

The Honorable Judith C. McCarthy United States Magistrate Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

**Re: United States v. Justine Ying**  
**Case No.: 7:22-mj-03841-UA-4**

Dear Judge McCarthy:

The undersigned has been appointed to represent Ms. Justine Ying in the above-captioned matter. The defendant, Justine Ying, respectfully moves, pursuant to 18 U.S.C. § 3145(a)(2), to amend the conditions of her release. Ms. Ying seeks an Order of the Court to permit her to travel to visit a friend in Boston, Massachusetts, with the advanced notification and approval of her United States Pretrial Services Officer, to visit from December 22, 2024 through December 24, 2024.

In order to facilitate the defendant's request, the defendant will do the following:

1. Ms. Ying will leave on December 22, 2024 to travel by plane to Boston, Massachusetts, and will return to her home on December 24, 2024.
2. Prior to having permission to travel outside the Southern District of Florida, Ms. Ying will identify the mode of transportation to and from the destinations listed (if an airplane Ms. Ying will provide airline, flight number, departure and arrival times).
3. Upon arriving back in the Southern District of Florida, Ms. Ying will telephone her probation officer and indicate that she has returned.
4. Ms. Ying communicated her request to United States Pretrial Services Officer Nelson Valenzuela from FLSD, who indicated that Probation has "no objections as long as [she gets] a court order."

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5. The undersigned has spoken to United States Attorney Steven Kochevar, who indicated that the government does not object to the requested modification.

WHEREFORE, the defendant moves that the Court issue an Order of the Court permitting the defendant to travel with the advanced notification and approval of her United States Pretrial Services Officer, to visit Boston, Massachusetts on the dates listed above, subject to the conditions imposed by her probation officer.

Respectfully Submitted

THE DEFENDANT,  
Justine Ying

By: */s/ Bruce D. Koffsky*

BDK/dgb

cc: AUSA Steven J. Kochevar via email  
Andrew Patel, Esq. via email

APPLICATION GRANTED.

Dated: December 16, 2024

**SO ORDERED.**



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ANDREW E. KRAUSE  
United States Magistrate Judge